

**UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION**

In re:

City of Detroit, Michigan,

Debtor.

Bankruptcy Case No. 13-53846

Judge Thomas J. Tucker

Chapter 9

**STIPULATION FOR ORDER EXTENDING DEADLINE FOR THE
ELECTRICAL WORKERS' PENSION TRUST FUND OF LOCAL UNION
58, I.B.E.W., DETROIT, MICHIGAN AND THE SHEET METAL
WORKERS' LOCAL UNION NO. 80 PENSION TRUST FUND TO FILE
THEIR RESPONSE IN OPPOSITION CITY OF DETROIT'S MOTION TO
ENFORCE CONFIRMATION ORDER AGAINST THE SHEET METAL
WORKERS' LOCAL UNION NO. 80 PENSION TRUST FUND AND
ELECTRICAL WORKERS' PENSION TRUST FUND OF LOCAL UNION
#58, I.B.E.W., DETROIT MICHIGAN [DOC. NO. 13308]**

The City of Detroit, Michigan ("City") and the Electrical Workers' Pension Trust Fund of Local Union #58, I.B.E.W., Detroit, Michigan and the Sheet Metal Workers' Local Union No. 80 Pension Trust Fund (together, the "Pension Funds"), by their undersigned counsel, hereby stipulate and agree as follows:

1. On August 28, 2020, the City filed the City of Detroit's Motion to Enforce the Confirmation Order Against the Sheet Metal Workers' Local Union No. 80 Pension Trust Fund and Electrical Workers' Pension Trust Fund of Local Union #58, I.B.E.W., Detroit Michigan (the "Motion to Enforce") [Doc. No. 13308].

2. Since the Motion to Enforce was filed, the City and the Pension Funds have exchanged certain information relevant to the relief sought by the Motion to Enforce in an effort to narrow the issues before the Court.

3. The current deadline for the Pension Funds to file their response to the Motion to Enforce is Friday, September 11, 2020.

4. The Pension Funds have requested and the City has agreed, subject to this Court's approval, to extend the deadline for the Pension Funds to file their response to the Motion to Enforce through and including Friday, September 25, 2020.

WHEREFORE, the City and the Pension Funds respectfully request that the Court enter an order in substantially the same form as the one attached as Exhibit 1 extending the deadline for the Pension Funds to file their response to the Motion to Enforce through and including Friday, September 25, 2020.

STIPULATED AND AGREED TO ON September 11, 2020:

By: /s/ Barbara A. Patek
Barbara A. Patek, Esq. (P34666)
Attorney for the Pension Funds
24 E. Flint Street, Suite 2
Lake Orion, MI 48362
(248) 814-9470
pateklaw@gmail.com

By: /s/ Marc N. Swanson
Marc N. Swanson (P71149)
Attorney for Debtor – City of Detroit
150 West Jefferson, Suite 2500
Detroit, MI 48226
(313) 496-7591
swansonm@millercanfield.com

EXHIBIT 1

**UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION**

In re:

City of Detroit, Michigan,

Debtor.

Bankruptcy Case No. 13-53846

Judge Thomas J. Tucker

Chapter 9

**ORDER EXTENDING DEADLINE FOR THE ELECTRICAL WORKERS'
PENSION TRUST FUND OF LOCAL UNION # 58, I.B.E.W., DETROIT,
MICHIGAN AND THE SHEET METAL WORKERS' LOCAL UNION NO.
80 PENSION TRUST FUND TO FILE THEIR RESPONSE IN
OPPOSITION CITY OF DETROIT'S MOTION TO ENFORCE
CONFIRMATION ORDER AGAINST THE SHEET METAL WORKERS'
LOCAL UNION NO. 80 PENSION TRUST FUND AND ELECTRICAL
WORKERS' PENSION TRUST FUND OF LOCAL UNION #58, I.B.E.W.,
DETROIT MICHIGAN [DOC. NO. 13308]**

This matter is before the Court on the Stipulation for Order Extending Deadline for the Electrical Workers' Pension Trust Fund of Local Union #58, I.B.E.W., Detroit, Michigan and the Sheet Metal Workers' Local Union No. 80 Pension Trust Fund (together, the "Pension Funds") to File Their Response to the City of Detroit's Motion to Enforce the Confirmation Order Against the Sheet Metal Workers' Local Union No. 80 Pension Trust Fund and Electrical Workers' Pension Trust Fund of Local Union #58, I.B.E.W., Detroit Michigan (the "Motion to Enforce") [Doc. No. ____]. The Court has read the stipulation and finds good cause to enter this Order.

IT IS ORDERED that the deadline for the Pension Funds to file their response to the Motion to Enforce is extended from Friday, September 11, 2020 through and including Friday, September 25, 2020.